

**EXHIBIT****125**

21-cv-00260-PB

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

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SECURITIES AND EXCHANGE	:	
COMMISSION,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Civil Action No. 1:21-cv-00260-PB
	:	
LBRY, INC.,	:	
	:	
Defendant.	:	
-----	X	

**DEFENDANT LBRY, INC.’S AMENDED RESPONSES AND OBJECTIONS  
TO PLAINTIFF SECURITIES AND EXCHANGE COMMISSION’S  
FIRST SET OF REQUESTS FOR ADMISSIONS**

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure (“Federal Rules”) and the Local Rules for the United States District Court for the District of New Hampshire (“Local Rules”), Defendant LBRY, Inc. (“LBRY”), by its attorneys, hereby amends its responses and objections to Plaintiff Securities and Exchange Commission’s (“SEC’s”) First Set of Requests for Admission (the “Requests,” and each, a “Request”), as follows:

**SPECIFIC OBJECTIONS AND RESPONSES**

**REQUEST NUMBER 2:** In May 2016, before the mining of the genesis block of the LBRY protocol, LBRY agreed with a third-party to provide them with LBC in exchange for help getting LBRY launched. (The word “launched” is as used by LBRY in the quote in Request No. 1).

**RESPONSE TO REQUEST NUMBER 2:** LBRY incorporates its General Objections, Objections to Definitions and the specific objections to this Request contained in LBRY’s Responses and Objections to the SEC’s First Set of Requests for Admission, dated March 9, 2022, as if fully restated herein.

Subject to and without waiving the foregoing objections, LBRY responds as follows: LBRY admits that it awarded LBC to individuals that tested the Alpha version of the LBRY Protocol and filled out a survey that was available on LBRY's website.

**REQUEST NUMBER 11:** LBRY has hosted on its servers more than 50% of the video content available through its applications LBRY.tv and Odysee.

**RESPONSE TO REQUEST NUMBER 11:** LBRY incorporates its General Objections, Objections to Definitions and the specific objections to this Request contained in LBRY's Responses and Objections to the SEC's First Set of Requests for Admission, dated March 9, 2022, as if fully restated herein.

Subject to and without waiving the foregoing objections, LBRY admits that LBRY maintains a copy of more than 50% of the content available through its Web-based applications on servers within its possession, custody or control. LBRY further responds that as the LBRY Network is permissionless, any user running the LBRY Protocol may also seed content to the LBRY Network and, in fact, there are tens of thousands of users who are currently doing so.

Dated: New York, New York.  
April 5, 2022

LBRY, INC.

/s/ Keith W. Miller

Keith W. Miller (*pro hac vice*)

Rachel S. Mechanic (*pro hac vice*)

John T. Dixon (*pro hac vice*)

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*Attorneys for Defendant LBRY, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing LBRY's Amended Responses and Objections to the Plaintiff's First Set of Requests for Admission was served upon all counsel of record via e-mail on April 5, 2022.

*/s/ John T. Dixon*

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